

Exhibit C

From: Evans-Aziz, Mikaela <mevansaziz@wsgr.com>
Sent: Friday, April 21, 2023 1:59 PM
To: Jason Zweig; Serina Vash; Stuart Davidson; Mark C. Mao; Jordan Elias; Ted Maya; Trevor Young; wnooss@koreintillery.com; Thomas Ray; 'Zeke DeRose III'; Thorne, John; Bird, Daniel G.; Goodnow, Christopher C.; Henningson, Sven E. (Trip); Maier, Eric J.; Philip Korologos
Cc: Sessions, Justina; MCCALLUM, Robert; ELMER, Julie (JSE); Justus, Bradley; Bitton, Daniel S.; Egoul, Vadim
Subject: [EXTERNAL] RE: In re Google

Eric:
 Thanks for your email.
 Plaintiffs have themselves to blame for any purported delay in the production of these documents. Over Google's objections, Plaintiffs insisted on a provision in the ESI Order requiring the parties to "meet and confer concerning the applicability of the [ESI Order] to any Documents to be reproduced in this action that were previously produced in another action or as part of a pre-complaint investigation." ECF No. 508 at 2. Following that meet and confer, Google instructed its document vendor to prepare the documents at issue for production and the vendor has indicated that the production will be ready in mid-May. We will then promptly produce those documents to you.
 We think that filing a motion to compel production on an earlier timeline would be a waste of judicial resources because the motion is moot. Google has agreed to produce the documents that are the subject of Plaintiffs' proposed motion. We anticipate that production will occur in advance of the substantial completion deadline set forth in Pre-Trial Order No. 5, and approximately fourteen months before the close of fact discovery.
 We are available to meet and confer.

Thanks,
 Mikaela

WILSON SONSINI

Mikaela E. Evans-Aziz | Associate | Wilson Sonsini Goodrich & Rosati

One Market Plaza, Spear Tower, Suite 3300 | San Francisco, CA 94105 | mobile: 619.395.2439 | mevansaziz@wsgr.com

From: Maier, Eric J. <emaier@kellogghansen.com>
Sent: Wednesday, April 19, 2023 3:50 PM
To: MCCALLUM, Robert <rob.mccallum@freshfields.com>
Cc: Jason Zweig <jaz@kellerpostman.com>; Serina Vash <svash@hermanjones.com>; Stuart Davidson <sdavidson@rgrdlaw.com>; Mark C. Mao <mmao@bsfllp.com>; Philip C. Korologos - Boies, Schiller & Flexner LLP (<pkorologos@bsfllp.com> <pkorologos@bsfllp.com>); Jordan Elias <jelias@girardsharp.com>; Ted Maya <tmaya@ahdootwolfson.com>; Trevor Young <Trevor.Young@oag.texas.gov>; wnooss@koreintillery.com; Justina Sessions <jsessions@wsgr.com>; Thomas Ray <Thomas.Ray@oag.texas.gov>; 'Zeke DeRose III' <Zeke.DeRose@LanierLawFirm.com>; Thorne, John <jthorne@kellogghansen.com>; Bird, Daniel G. <dbird@kellogghansen.com>; Goodnow, Christopher C. <cgoodnow@kellogghansen.com>; Henningson, Sven E. (Trip) <shenningson@kellogghansen.com>
Subject: RE: In re Google
 Rob,

Plaintiffs have now made clear on March 23, 28 and April 12 that they will accept, without reformatting, the approximately 800,000 documents produced to DOJ in its ad tech investigation but not to plaintiffs in these actions. The

need to discuss reformatting those documents is the only justification Google has provided for refusing to produce those documents. Google's obligation to produce these documents bears no relation with "other discovery issues," and we reiterate (for the fourth time) that no reformatting is necessary. Please confirm by this Friday, April 21 at 2:00pm ET that Google will produce the 800,000 documents by Monday, April 24. Otherwise, we will file a letter motion to compel production of those documents.

Regards,

Eric

Eric J. Maier

Kellogg, Hansen, Todd, Figel, & Frederick, P.L.L.C.

1615 M Street, N.W. | Suite 400 | Washington, DC 20036 | (202) 326-7923

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From: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>

Sent: Tuesday, April 18, 2023 9:29 AM

To: MCCALLUM, Robert <rob.mccallum@freshfields.com>

Cc: Jason Zweig <jaz@kellerpostman.com>; Serina Vash <svash@hermanjones.com>; Stuart Davidson <sdavidson@rgrdlaw.com>; Mark C. Mao <mmao@bsfllp.com>; Philip C. Korologos - Boies, Schiller & Flexner LLP (<pkorologos@bsfllp.com>); Jordan Elias <jelias@girardsharp.com>; Ted Maya <tmaya@ahdootwolfson.com>; Trevor Young <Trevor.Young@oag.texas.gov>; wnoss@koreintillery.com; Justina Sessions <jsessions@wsgr.com>; Thomas Ray <Thomas.Ray@oag.texas.gov>; Maier, Eric J. <emaier@kelloggghansen.com>

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Adding DailyMail.

Zeke DeRose III - Attorney p: 713-659-5200 w: www.LanierLawFirm.com

On Apr 17, 2023, at 9:53 PM, MCCALLUM, Robert <rob.mccallum@freshfields.com> wrote:

Jason:

Thanks for your letter. As to documents produced to Google pursuant to subpoenas, we are preparing a production which I expect you will receive on or before Wednesday. As to documents previously produced to DOJ, we anticipate sending an update on this and other discovery issues later this week. Feel free to give me a call if you have any questions in the meantime.

Kind regards,

Rob

From: Jason Zweig <jaz@kellerpostman.com>

Sent: Wednesday, April 12, 2023 2:45 PM

To: MCCALLUM, Robert <rob.mccallum@freshfields.com>

Cc: Serina Vash <svash@hermanjones.com>; Stuart Davidson <sdavidson@rgrdlaw.com>; Mark C. Mao <mmao@BSFLLP.com>; Philip C. Korologos - Boies, Schiller & Flexner LLP (<pkorologos@bsfllp.com>); Jordan Elias <jelias@girardsharp.com>; Ted Maya <tmaya@ahdootwolfson.com>; Zeke DeRose <zeke.derose@lanierlawfirm.com>; Trevor Young <trevor.young@oag.texas.gov>; wnoss@koreintillery.com; Justina Sessions <jsessions@wsgr.com>; Thomas Ray <thomas.ray@oag.texas.gov>

Subject: In re Google

Please see attached.

Jason Zweig

Partner

Keller | Postman

150 N. Riverside Plaza, Suite 4100 | Chicago, IL, 60606
[312.216.8667](tel:312.216.8667) | [Email](#) | [Bio](#) | [Website](#)

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